# ADVISOR

ENVIRONMENTAL INFORMATION FOR WISCONSIN SMALL BUSINESSES

Spring 2001

Volume 7, Issue 2

#### **Small Business Assistance on the Web!!**

Yes! You can now find the fact sheets created by the Small Business Clean Air Assistance Program (SBCAAP) and other regulatory assistance resources provided by the program on the Department of Commerce web site.

The address for our home page is: www.commerce.state.wi.us/MT/MT-CA-sbcaap.html.

We provide information on:

- services our program offers;
- > the Small Business Environmental Council:
- > new, pending, proposed or recently finalized regulations;
- > related environmental links; and
- > a list of our publications.

The publications available from the website are in Portable Document

Format (PDF). You can read a PDF file if you have the Adobe Acrobat Reader on your computer. If you have not installed that yet, go to the Adobe web site at <a href="www.adobe.com">www.adobe.com</a> and find the "Get Acrobat Reader" button. Follow that to the download page and download the program. Available for PCs or MACs, Acrobat Reader works on a wide range of operating systems.

You download the version of Adobe you need by identifying which operating system you use, such as: Windows 3.1, Windows 95 or 98 or 2000; or for the different versions of MAC PCs.

Please contact us if you have any problems with the site. Email us at CleanAir@commerce.state.wi.us or call 608/264-6153. ❖

New From the Small Business Clean Air Assistance Program...

- ✓ Asbestos -Renovation and Demolition: requirements that apply to handling asbestos.
- ✓ Industrial Solvent Clean-up Operations RACT
- ✔ Plastic Parts Coating RACT

To order: call (608) 264-6153 or (608) 267-9214; fax (608) 267-0436; or email CleanAir@ commerce.state.wi.us

#### **Plastic Parts Coating RACT Rule on the Horizon**

The Wisconsin Department of Natural Resources (DNR) was required to submit a 1-Hour Ozone Attainment Demonstration Plan (Plan) to the US Environmental Protection Agency (EPA) by December 2000. This Plan was necessary to meet EPA's requirements for a complete State Implementation Plan (SIP).

#### New RACT Rule Included

A rule to establish reasonable available control technology (RACT) emission limits on volatile organic compounds (VOCs) from plastic parts coating operations was included in that package and may affect small businesses located in the ozone nonattainment area.

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#### Plastic Parts RACT (cont from Page 1)

Plastic part coating is defined as coating applied to any part made from a material "formed from resin through application of pressure or heat or both." The emission limits established in this rule only apply to parts that are not already regulated by another RACT rule. If you have a permit and you are already affected by a RACT rule consult the following Wisconsin Administrative Code sections:

- **1** sections NR 419.05, 419.06 or 419.08,
- 2 chapters NR 420 and 421,
- sections NR 422.05 to 422.08 or 422.085 to 422.17, or
- sections NR 423.03, 423.035, 423.04, 423.05, 424.04 or 424.05.

#### **Exemptions**

This new RACT rule affects only those facilities that are a major source of VOCs from their plastic parts operations alone. You are a major source if your maximum theoretical emissions (MTE) of VOCs from plastic parts coatings are:

- > greater than 25 tons per year (TPY) and you are located in Kenosha, Milwaukee, Ozaukee, Racine, Washington or Waukesha counties; OR
- ➤ greater than 100 TPY and you are located in Kewaunee, Manitowoc or Sheboygan counties.

The MTE is the level of emissions you would generate if your plastic parts coating line operated continuously, at full capacity for the whole year, regardless of whether you have a control device installed. For assistance on calculating the MTE of VOCs for your facility, you can contact the Small Business Clean Air Assistance Program (SBCAAP). Staff will go over it with you or send you a fact sheet with some example calculations.

The emissions limits are listed by type of operation in the box on this page. If these limits apply to you, you must be in compliance **by May 1, 2002**. •

Activity	VOC Content (lb/gal)	
* Automotive/transportation		
- Interiors		
~ Baked: Prime/Pigme		
~ Air dried: Prime/Pigmented Coats 3.5/3.2		
- Exteriors		
~ Baked		
> Prime Coats (none	elastomeric) 4.5	
> Prime Coats (elas	tomeric) 5.0	
> Pigmented Coats	4.6	
> Clear Coats	4.3	
~ Air dried		
> Prime Coats	5.5	
> Pigmented (red &	black) 5.6	
> Pigmented (other		
> Clear Coats	4.5	
- Specialty		
> vacuum metallizing, texture basecoats 5.5		
> black, reflective argent, air bag		
cover, and soft co		
> antiglare/safety co	•	
metallizing and texture topcoat 6.4		
> stencils, adhesive primers, ink pad,		
•	and resist coatings 6.8	
> head lamp lens co	_	
* Business Machine	ratiligs 7.4	
- Prime Coats	1.2	
	2.3	
- Pigmented Coats		
- Electromagnetic interference/radio frequency		
interference (EMI/RFI) shield coatings 4.0		
- Specialty	4.0	
~ Soft coatings	4.3	
~ Resist coatings	5.9	
~ Sensitizer coatings	7.1	
* Miscellaneous		
- Building shutters		
~ Pigmented coatings		
> Extreme performa		
> All others	4.1	
- Signs		
<ul><li>Mask coatings</li></ul>	0.8	
~ Pigmented coatings		
> Extreme performa	nce 6.2	
> All others	4.1	
- Trim for interior office windows and walls		
Pigmented coatings	2.5	
- Weather stripping and r	nolding	
~ Pigmented coatings	6.2	
> Extreme performa	nce 6.2	
> All others	4.1	

### **Small Business Advocate Alert**

Welcome to a new feature of the Clean Air Advisor - the **Small Business Advocate Alert**.

Pam Christenson, formerly with the Small Business Clean Air Assistance Program, became the Small Business Ombudsman (SBO) for the Department of Commerce in the fall of 2000. While she will continue to work with small businesses on environmental issues, the SBO position helps businesses in many other areas as well. Through this Ombudsman position, Pam will be tracking regulations, policies and programs that affect smaller businesses all around the state. Things you will find in the Advocate Alert include:

- ✓ Information on proposed rules under consideration by various state agencies.
- ✓ Notices of upcoming public hearings and public comment periods on new regulations affecting small businesses.
- ✓ Announcements on future training programs and workshops.
- Opportunities to provide input on possible future regulations.

For more information on the Small Business Ombudsman activities, contact Pam Christenson at 608/267-9384 or by email at <a href="mailto:pchristenson@commerce.state.wi.us">pchristenson@commerce.state.wi.us</a>. <a href="mailto:pchristenson@commerce.state.wi.us">pchristenson@commerce.state.wi.us</a>.

### **Electronic Compliance Assistance Resources**

Electronic resources providing compliance assistance and pollution prevention information are constantly being developed by local, state and federal programs. It can be difficult to keep track of all these new resources unless you are watching the internet regularly. Here are a few more resources that may assist you in your compliance efforts:

DNR permit and reporting requirements often require that you have detailed information on the chemicals or materials you use. A couple web sites may help you find some of that information:

#### chemfinder/camsoft.com

This site allows you to enter CAS# (found on a material safety data sheet or container labels) or chemical name and will return search results that can include physical properties, health effects, usage, regulations, etc.

#### www.environmentalchemistry.com

This site will provide chemistry, environmental and hazardous materials educational resources, including a chemistry and environmental dictionary to define many technical terms and acronyms.

This web site includes fact sheets, technical background information and copies of the rules for MACT standards that have been or will be promulgated by EPA (see page 6 for a couple of examples):

www.epa.gov/ttn/uatw/eparules.html

The standards are divided into the following groups: 2-year, 4-year, 7-year and 10-year MACTs. They are also organized by source category in alphabetical order. This makes it easy to scroll through the lists and find a source category that might apply to your facility if you are not already affected by a standard. •

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## Wisconsin Partners for Clean Air Sponsors EPA's Commuter Choice Event

On February 21, 2001, nearly sixty southeastern Wisconsin businesses, transit agencies and others participated in a Commuter Choice Initiative Workshop. The event was sponsored by Wisconsin Partners for Clean Air, which is committed to reducing harmful emissions and improving air quality throughout southeastern Wisconsin by voluntarily adopting innovative strategies.

#### What is Commuter Choice?

Pollution levels in southeastern Wisconsin caused by traffic in the southeast portion of Wisconsin and in similar urban areas throughout the United States, have driven the US Environmental Protection Agency (EPA) to create a program that works with employers and local governments to offer incentives and encourage commuters to use alternate transportation. Regulatory programs set up to address air pollution in urban areas have fallen short, so EPA sees voluntary efforts like Commuter Choice as an important way to achieve additional reductions in pollution.

EPA's goal is to sign up 1000 major employers nation-wide in the next two years. Smaller businesses may find ways to contribute as well. Vehicle miles driven by commuters has doubled since 1970. If half of all commuters were to use Commuter Choice options, they could save \$10 billion annually in fuel costs and reduce emissions by an amount equal to that of taking 15 million cars off the road.

Transit operators in southeastern Wisconsin play a critical role in the Commuter Choice Initiative. Transit systems in southeast Wisconsin stand ready to work with employers to implement programs for employees to use as an alternative to driving alone. Milwaukee County Transit System has one of the more

established programs in southeastern Wisconsin. MCTS offers an unlimited use bus pass through its Commuter Value Pass program that requires an employer participation. The program currently serves around 3,200 commuters. Milwaukee area businesses can also offer MCTS Commuter Value Certificates to employees who are less frequent transit riders.

## What are the Benefits to the Employer and Employee?

Under EPA's Commuter Choice program a business offers employees a core benefit such as a transit pass, telecommuting, parking cash-out or an equivalent option. Employers can pay for the benefit or offer a pre-tax deduction from the employee's paycheck. Employers would also offer other minor core benefits, that would range from providing bike racks and showers to reimbursement for running shoes or rollerblades to time off for trying an alternative commute option. For those employees that use a form of public transportation, the employer would offer a "guaranteed ride home" in case of an emergency.

To attract businesses to the program, EPA created the Commuter Choice Leadership Initiative as a national standard of excellence. EPA would provide public recognition of participating businesses. The agency would help promote commuter-friendly employers and help them get the commuter-friendly tax breaks. The businesses can use it as a marketing tool to draw in employees with an interest in working for someone that provides for alternative commuting.

Further information on the Wisconsin Partners for Clean Air can be found on the Internet at: www.dnr.state.wi.us/org/aw/air/vol/index.htm. If you have any questions on the Commuter Choice program in Wisconsin, please contact Peter McMullen at 414/263-8751.

## Council's Corner... Who is The Small Business Environmental Council?

The Small Business Environmental Council is one element of the three part Small Business Clean Air Assistance Program. The other elements are the Technical Assistance staff (who write this newsletter) and the Clean Air Ombudsman. Each of these three program elements are required in section 507 of the Clean Air Act.

#### **Council Membership**

The Council has nine members. Each is appointed for a 3-year term. Seven members are appointed by either the majority and minority leaders from both the State Assembly and Senate (one each, for a total of four) or the Governor (appoints three). The members can either represent the public or are owners or the representatives of owners of a small business. The last two members represent the Department of Natural Resources (DNR) and Department of Commerce (Commerce).

#### Activities and Responsibilities

The council is charged with the responsibilities under section 506.11, Wisconsin Statutes, related to the requirements of the Clean Air Act as implemented by the DNR's Air Program. The council meets every two months on various environmental issues that effect smaller businesses.

The council reviews and comments on how the DNR disseminates information to small businesses; whether the information is understandable to laypersons; whether new air regulations meet the paperwork reduction act; and any difficulties encountered by small businesses trying to comply with the air regulations.

The members also believe that they can assist other small businesses by acting as

mentors. The council member you contact may not work in the same industry, but he or she can provide some general guidance on how to work with the state and/or federal agencies involved.

#### Experiences of One Council Member

Over the next few issues of this newsletter, we'd like to highlight the experiences of some of the council members. This may help you see how your company can benefit from using the Small Business Clean Air Assistance Program.

The Chair of the Council, Carl Komassa, represents a lithographic printer. A few years ago, the DNR was drafting a rule for Reasonably Available Control Technology (RACT) that would reduce emissions of volatile organic compounds (VOCs) from Lithographic Printers. When the council was made aware of the proposed rule, it concluded that the rule did not reflect the industry concerns and operations.

To ensure the rule would accurately fit the industry, Carl invited the DNR rule writer into the facility for a tour and explained its operations. As a result, the RACT rule for Lithographic Printers more accurately represents the operations in the lithographic printing industry.

If you find yourself in a similar situation, you can contact the technical assistance staff of the SBCAAP, either via email at CleanAir@commerce.state.wi.us or by calling 608/264-6153 or 608/267-9214. We will put you in contact with the council member that can best help you. ❖

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## **New MACT Standards Proposed**

#### Paper and Other Web Coating MACT

The proposed MACT for Paper and Other Web Coating (POWC) covers coatings applied for decorative and/or functional purposes on one or both sides of a continuous web (i.e. roll of paper, plastic, film or foil).

EPA provides a list of SIC codes (see Table 1) for those industries that might be affected by the MACT standard. Even if a facility does not list one of those SICs as its primary activity, it may be affected if it coats any type of continuous web of material.

If a facility operates under these SIC codes, but primarily prints rather than coats the materials, it may have opted to meet the Printing and Publishing MACT.

The emissions limits of the Paper and Other Web Coating MACT differ for existing and new sources. The limits are based on control technologies (i.e., incinerator) and/or techniques (i.e., low VOC coating substitution)

TABLE 1		
Description	SIC Code	
Corrugated and solid fiber boxes	2653	
Folding paper board boxes, incl. sanitary	2657	
Packaging paper and plastics film	2671	
Coated/laminated paper, not elsewhere classified 2672		
Plastics, foil, and coated paper bags	2673	
Bags: uncoated paper and multi wall	2674	
Die-cut paper and paperboard and cardboard	2675	
Converted paper and paperboard, NEC	2679	
Commercial printing, gravure	2754	
Manifold business forms	2761	
Plastic aseptic packaging	3074	
Unsupported plastics film and sheet	3081	
Laminated plastics plate, sheet, and profile shapes 3083		
Abrasive products	3291	
Laminated aluminum (metal) foil and leaf, flexible packag-		
ing	3497	
Photographic equipment and supplies	3861	
Carbon paper and inked ribbons	3955	
Linoleum, asphalted-felt-base, and other hard surface		
floor coverings	3996	

that reduce organic hazardous air pollutant emissions by 95% for existing sources and by 98% for new sources. Existing sources will have to comply three years from the date the final MACT is promulgated, but new sources will have to comply immediately if equipment is installed after that promulgation date. EPA expects to issue the final POWC MACT in August 2001.

#### Metal Coil Coating MACT

The proposed Metal Coil Coating MACT applies to the process of applying a coating (protective or decorative) to one or both sides of a continuous strip of sheet metal. The strip of metal may then be rolled back into a coil for shipment off-site or used in an assembly process on-site.

Some industries that may be affected are:

- ✓ transportation,
- building products,
- appliances,
- can manufacturing,
- ✓ packaging;

as well as manufacturers of:

- coated tape rules,
- ventilation systems for walls and roofs,
- ✓ lighting fixtures,
- office filing cabinets,
- ✓ cookware, and
- ✓ sign stock.

The emission limits for Metal Coil Coaters will be either the use of a capture and control system to reduce emissions by 98% or to emit less than 0.24 pounds of organic hazardous air pollutants per gallon of solids applied, on average, in each month, by any combination of material formulation and controls. The same limits apply to new and existing sources.

\*

## Hot Topics in DNR's Air Program

#### Check them out at: www.dnr.state.wi.us/org/aw/air/hot/index

#### Mercury Reduction Rule

The Department of Natural Resources (DNR) is writing a proposed rule aimed at reducing airborne mercury that ends up in Wisconsin lakes and rivers, and eventually in fish and the people who eat them. The rules seek to reduce mercury emissions from sources, including electric utilities and government-owned heat and power facilities.

Mercury in Wisconsin waters is converted by bacteria into a form that can be taken up into the aquatic food chain, where it concentrates at each step of the way and is eventually absorbed into the tissues of people who eat the fish.

This rule-making was in response to a petition filed last May by Wisconsin Environmental Decade and signed by 26 environmental and sportfishing groups, lake associations and several lawmakers. Upon receiving the petition, DNR determined that it has the authority to establish mercury limits to protect public health and the environment. By March 2001 it will draft proposed rules that protect public health and the environment, but are cost effective, reasonable, and do not interfere with the utilities' ability to supply the state's energy needs. After NRB approval in March, DNR will hold public hearings on the proposed rule around the state.

The proposed rule would include the percent reductions sought and a schedule for achieving reductions. If you would like further information on this topic, visit the Hot Topics web page listed above. •

#### **Emissions Reduction Registry**

DNR is drafting a rule to establish and operate a system to register reductions in emissions of greenhouses gases. Any emissions reductions to be registered need to be achieved before there is a rule that requires the reductions.

tions. The system would be voluntary.

Under the system, the DNR may register carbon emissions that would be "removed" from the air by creating or preserving carbon reserves, such as forests. It will also register emissions that are avoided because of energy effi-

ciency measures or the use of renewable energy sources. The registry will <u>not</u> be used to track any reduction in emissions of greenhouse gases if the reduction was made before January 1, 1991.

#### Greenhouse gases include:

- \* carbon dioxide,
- \* methane,
- \* nitrous oxide,
- \* hydrofluorcarbons,
- # perfluorocarbons,
- \* sulfur hexafluoride and
- \* any other gas that traps heat in the atmosphere.

The DNR may also establish and operate a registry system for reductions in emissions of fine particulate matter, mercury, or other air contaminants identified by the agency. All reductions must be achieved before those same reductions are required by rule.

The rules are being drafted with the participation of a stakeholder advisory committee. If you would like further information on this topic you can go to the Hot Topics web page listed above. •

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#### Pollution Prevention Conference in WI This Summer

The Great Lakes Regional Pollution Prevention Roundtable (GLRPPR) is holding its Summer Conference for 2001 in Madison on July 11-13.

#### Who Should Attend?

- ? Are you from a local government agency that wants to make its procurement policies more environmentally friendly?
- ? Are you the environmental staff for an industrial facility who would like to hear how others have reduced their waste or emissions?
- ? Would you like to hear about how other businesses have used pollution prevention (P2) or an environmental management system (EMS) at their facilities?
- ? Would you like to hear about energy conservation projects or find out what Green Building and Smart Growth initiatives are all about?

#### **Topics**

Some of the main topics will be:

- ✓ P2 Case Studies of WI Companies
- ✓ P2 Resources for POTW's and Local Gov't
- ✓ EMS and improving P2 performance
- ✓ Green Building and Smart Growth
- ✓ Integrating P2 into regulatory activities
- ✔ DNR Pilot Projects

#### Registration

If you would like to attend, visit the GLRPPR website at www.glrppr.org. To register, go to www.glrppr.org/conferencereg/, or contact Deb Jacobsen at 630/472-5019 for registration materials. The registration fee is \$85 for non-members, which includes conference materials, lunches and breaks. ❖

## DEPARTMENT OF COMMERCE

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